

## LICENSING/APPROVAL/REGISTRATION INSPECTION SUMMARY

NAME OF AGENCY/FACILITY		TELEPHONE	PAGE 1 OF 14		
Glen Mills School		(610) 459-8100	OCYF REGIONAL STAFF APPROVAL		
Address Concordville, PA 19331		COUNTY Delaware	DATE		
INSPECTED BY Bryl Debnam/Robert DiStanislao		INSPECTION DATE 02/11/00; 03/16/00			
<input type="checkbox"/> INITIAL INSPECTION <input type="checkbox"/> RENEWAL INSPECTION <input type="checkbox"/> COMPLAINT <input type="checkbox"/> UNANNOUNCED INSPECTION <input type="checkbox"/> RANDOM SAMPLE					
1. SPACODE CHAPTER	2. NON-COMPLIANCE AREA	3. CORRECTION REQUIRED	4. REQUIRED CORRECTION DATE	5. PROVIDERS PLAN OF CORRECTION OR RESPONSE	6. STATUS OF CORRECTION
P.S. 911(b) Pa. C.S. §40(a)(9), §62(d) Pa. Code §34	<p>On February 11, 2000 the facility prevented departmental staff and two state police officers access to the facility and/or to a child. On the same date, the facility denied the department and state police the opportunity to privately interview a child. Access to the facility and the child and the opportunity to privately interview the child was denied by Chief Executive Officer [REDACTED] Unit Leader [REDACTED] and other Glen Mills staff. Details regarding these events are described below.</p> <p>At approximately 1:30PM, the department conducted a site visit in response to an allegation of child abuse. The departmental staff person was accompanied by two state police officers. During the course of the investigation several other allegations of child abuse were received by the State of Delaware Office of Children and</p>	Provide immediate access to the facility, its grounds, records, staff and children to representatives of the Department and its authorized agents.	Immediately and ongoing	#1 See Attached Response Page 15	

THE LEGAL ENTITY REPRESENTATIVE MUST COMPLETE COLUMN 5, SIGN ON THE SIGNATURE LINE AT THE BOTTOM AND DATE ALL PAGES OF THIS DOCUMENT.  
RETURN THIS ENTIRE DOCUMENT TO YOUR REGIONAL OFFICE BY



SIGNATURE OF THE LEGAL ENTITY REPRESENTATIVE

(610) 459-8100

EXECUTIVE DIRECTOR

TITLE

August 14, 2000

# Consent/Approval/Registration Inspection Summary - Continuation Sheet

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2	<p>Youth. A state police officer requested access to a child in order to privately interview the child relating to allegations of child abuse. Access to the facility and the child was repeatedly denied and physically obstructed by Unit Leader [REDACTED] and several other Glen Mills staff, even following explanation by the state police officer that they were obstructing a police investigation of a crime. Although access to the facility continued to be denied, the state police officer eventually located the child and removed him from his living unit, Van Buren Hall, and placed the child in a police vehicle.</p> <p>While seated inside the police vehicle with a state police officer, at least three Glen Mills staff members, including Chief Executive Officer, [REDACTED] began to yell at the child and the officer. Mr. [REDACTED] and other Glen Mills staff threatened the state police officer with aggressive movements and speech. Both [REDACTED] and the staff became increasingly belligerent. The state police officer threatened arrest of the Glen Mills staff if they did not back away. Fearing for the safety of the child and himself, the officer left the facility grounds and took the child to the state police barracks in order to ensure continued safety.</p>				

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3. VIOLATION	2. NON-COMPLIANCE AREA	1. CORRECTION REQUIRED	4. REQUIRED CORRECTION DATE	5. PROVIDER'S PLAN OF CORRECTION OR RESPONSE	6. PLAN OF CORRECTION/RESPONSE STATUS
	<p>At the request of the state police officer, about six to eight additional state police personnel arrived at the scene to assist departmental staff in carrying out its statutory duties.</p> <p>On March 16, 2000 the facility again prevented departmental staff and one state police officer access to five children. On the same date, the facility denied the department and state police the opportunity to privately interview one child. Access and the opportunity to privately interview these children was denied by Chief Executive Officer [REDACTED] Unit Leader [REDACTED] and other Glen Mills staff. Details of these events are described below.</p> <p>At approximately 11:00am, the department conducted a site visit in response to an allegation of child abuse. The departmental staff person was accompanied by one state police officer. When the departmental staff person and state police officer requested to see the five children about whom child abuse allegations had been made, the facility denied access to the youth. The departmental staff person reported to his supervisor that access was being denied. The supervisor contacted the jurisdiction responsible for the placement and requested that a contact be made with Glen Mills management so that the children could be interviewed. It was only after this contact was made</p>				

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1. DURATION	2. NON-COMPLIANCE AREA	3. CORRECTION REQUIRED	4. REQUIRED CORRECTION DATE	5. PROVIDER'S PLAN OF CORRECTION OR RESPONSE	6. PLAN OF CORRECTION/RESPONSE STATUS
	<p>that departmental staff were given access to the youth and permitted to interview them. Access to the youth by state police was denied by the facility.</p> <p>While being interviewed by departmental staff, one child reported that he did not feel safe being interviewed at the facility and requested that the interview take place off grounds. The facility denied state police access to the child for the purpose of transporting the child to the state police barracks to interview the child. Access to the child was denied by Glen Mills Chief Executive Officer [REDACTED] and Glen Mills counsel Guy Vilin, Esquire. [REDACTED] placed his body between the state police officer and the child to prevent the officer from escorting the child to a state police vehicle. The officer was permitted to escort the child off grounds only after he advised [REDACTED] that he would be arrested if he did not move out of the way.</p>				
51(a) Abuse.	<p>Facility staff failed to report two incidents of child abuse regarding B. This child sustained a chipped tooth and chest bruising as a result of corporal punishment administered by two Glen Mills staff members, Z and Y. The child reported the injuries to other staff members and requested that these incidents be noted in the unit log. He also requested medical and dental treatment. No report of alleged child abuse was made by the</p>	<p>Report all incidents in which a youth alleges abuse by a staff member to Childline. Revise facility policy regarding reports of alleged abuse and submit to the Department for approval. Once approved, Department staff and facility staff jointly train all facility staff in their responsibility regarding reporting. All youth and their parents must be informed in writing of their right to be free from abuse or mistreatment and must be informed of who they should call if they</p>	<p>For reporting to Childline: Immediately. For revision of facility policy: 5 work days following receipt of LIS. For staff training and documentation in employee records: Complete within 31 calendar</p>	#2 See Attached Response Page 16	

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1. REGULATION	2. NON-COMPLIANCE AREA	3. CORRECTION REQUIRED	4. REQUIRED CORRECTION DATE	5. PROVIDER'S PLAN OF CORRECTION OR RESPONSE	6. PLAN # CORRECTION/RESPONSE STATUS
5	facility nor was the child provided with any medical care.	believe they have been abused by staff at the facility. Document in the youth's record and in the employee's record. After completing this with all youth currently in residence, this must continue with all youth admitted to the program. Documentation of same must be placed in each youth's record. (see also corrective action 3800.32(b)).	days of receipt of LIS. For notice to youth and parents and documentation in records: Complete within 45 calendar days of receipt of LIS.		

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51(b) Abuse	<p>The facility's plan of safety for Glen Mills staff member, X, who has been criminally charged with aggravated assault, simple assault and reckless endangerment on February 2, 2000 did not assure the safety of children. On February 11, 2000 it was observed by the State of Delaware Office of Children and Youth staff person that staff person X was still working directly with children in Van Buren Hall. The facility's Managing Director confirmed that X was still working directly with children on March 8, 2000.</p> <p>The facility's plan of supervision regarding 13 pending child abuse investigations did not assure the safety of the subject child and other children being served at the facility. Of the plans of supervision submitted, 11 of the 13 were not submitted within 24 hours of the facility being made aware of the existence of the abuse report. Of the plans received, none were sufficient to assure the safety of the children in residence at the facility upon initial submission. The plans were returned to the facility for resubmission on April 4, 2000. The facility notified the Department on April 5, 2000 that those named as alleged perpetrators were no longer employed by Glen Mills Schools. That plan of supervision was accepted by the Department on April 5, 2000.</p>	<p>Prepare and submit an acceptable plan of supervision for all allegations of child abuse within 24 hours of notification to the facility that a report has been received for investigation. Establish and implement facility protocols for use when plans of supervision are needed that include separation of youth and alleged perpetrator, addition of supervision of alleged perpetrator during the investigation, removal of the alleged perpetrator from direct child care and removal of the alleged perpetrator from the facility grounds. Based on the nature of the allegations, plans of supervision could include any of these options.</p>	<p>For submission of plans: Immediately</p> <p>For facility protocols: within 10 work days of receipt of LIS.</p>	#3 See Attached Response Page 17	

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31 Location Rights Grievance Procedures.	Three children reported that they were told there would be retaliation if allegations of abuse were made regarding Glen Mills staff. One child, A, stated that he was told by staff that if the child said he did not feel safe at Glen Mills and was removed from Glen Mills, that he would go to his state's youth detention center. Another youth, B, stated that he was told by Glen Mills staff that if he said he did not feel safe at Glen Mills, that he would go back to his county's detention center and would have to start his commitment all over again. A third youth, C, stated that he was told by Glen Mills staff in Madison Hall that children who make allegations of child abuse never win. He also stated that after the case is unfounded, Glen Mills would sue the child's parents for false accusations.	Provide all youth and their parents with written notice of their right to lodge grievances or complaints regarding child rights without fear of retaliation by staff. Provide all staff with written notice of the procedures to be followed when a grievance or complaint is made. Provide all staff with written notice that there can be no retaliation of any kind against any youth who files a grievance or complaint. Establish and implement a progressive disciplinary process for use with staff who violate this policy. All written notice and policy statements are to be approved by the Department. Evidence of this must be provided to the Department.	Submit written notice documents to the Department: 15 work days following receipt of LIS.  Provide notice to youth and parents and document in youth's record: 20 work days following receipt of the LIS	#4 See Attached Response Page 18	.
32(b) Fictitious	Application of the facility's level system of restrictive procedures subjects children to corporal punishment, threats and harassment. The level system is applied to administer corporal punishment for behavior management purposes. Glen Mills staff are sufficiently threatening to children that one child, D, stated that he inflicted serious injuries to himself in order to get to a medical facility in an effort to report abuse to someone outside the facility. One child, C, wrote to a parent stating that he was hit by staff but asking the	Abolish the seven level behavior management policy. Eliminate all physical contact between staff and youth other than that which complies with the restrictive procedures requirements of Chapter 3800.202-213. (see corrective action for 3800.33(a)) Provide all staff with written notice that the seven level system of behavior management is abolished effective immediately. Establish and implement facility policy regarding the procedures that must be followed prior to any physical contact between staff and youth that comply with 3800.202-213. Establish a progressive disciplinary	Abolish seven levels: Immediately Eliminate physical contact between staff and youth except that which meets the requirements of 3800.202-213; Immediately Inform youth and document in youth's	#5 See Attached Response Page 19	

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REGULATION	NON-COMPLIANCE AREA	CORRECTION REQUIRED	REQUIRED CORRECTION DATE	PROVIDER'S PLAN OF CORRECTION OR RESPONSE	PLAN OF CORRECTION/RESPONSE STATUS
00	parent not to report this to anyone for fear of retaliation by staff. One youth, E, stated that staff told him that it was written into Glen Mills policy that children can be punched by staff anywhere from the neck to the waist. Eight of the children reported that they were kicked, punched, "chopped in the throat", slapped, pushed or slammed into walls by eighteen different Glen Mills staff members from six different living units.	program to address staff non-compliance with the policy. Retain a consultant approved by the Department to assist with preparation of facility policy and disciplinary program. Retrain all staff using curriculum and trainers approved by the Department. Conduct staff training with consultant and Departmental staff present. Conduct meetings with all youth with consultant and Departmental staff present. Inform all youth in writing of their rights and the ability to make child abuse allegations that will be reported to ChildLine. After establishing this with all youth currently in residence all youth admitted to the program must be informed of their right to be free from abuse or mistreatment and documentation signed by the youth must be maintained in the youth's record. All new staff must be trained and a signed statement from the employee must be maintained in the employee record.	records with statement signed by youth; 10 work days following receipt of LIS. Retain Department approved consultant; 15 work days following receipt of LIS. Retrain all staff and document in staff records with signed statement by staff; begin 60 calendar days following receipt of LIS, complete 90 calendar days following receipt of LIS.		

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12.(e) ific ts  6	The facility's practice that children are not permitted to speak by telephone with their parent, probation officers or departmental staff without a Glen Mills staff member present is unreasonable and violates the child's right to communicate with others by telephone. Several children interviewed by departmental staff reported that they fear retaliation from Glen Mills staffpersons if negative comments are made to callers. Two juvenile probation officers reported to the department in February and March, 2000 that they question the veracity of information they receive from children when speaking with children by telephone due to Glen Mills policy of not permitting private telephone communication. One parent stated that during her visits to her son, she was not permitted to speak privately with him. One child, F, reported that he could not get to a telephone when he was in trouble and was not permitted to speak privately on the telephone as a matter of facility policy.	Provide the opportunity for youth to have private telephone conversations with family members without the presence of facility staff unless such private contact is prohibited by the committing jurisdiction. Establish a policy regarding private telephone calls.	Immediately	#6 See Attached Response Page 20	

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1.32(g)(1) Specific R.S.	<p>The facility staff violate the children's right to sent and receive mail by reading all outgoing mail to assure that no negative comments are made by youth to others about their treatment at the facility.</p> <p>Two children, C and D, reported that all outgoing mail is read by facility staff. One child reported that he was able to get a letter telling his mother he was being beaten out of the facility by giving another letter to the staff and then inserting the second letter into the envelope after the staff had read the first letter.</p>	<p>Cease the practice of reviewing outgoing mail for all youth. Outgoing mail may only be reviewed by staff if there is a court order authorizing such a review. Establish policy that prohibits review of outgoing mail except when ordered by the court with jurisdiction over the youth.</p>	Immediately	#7 See Attached Response Page 21	
32(k) Specific s. 01	<p>The facility violates the children's right to appropriate medical and dental care. Two children, C and B, sustained injuries as a result of corporal punishment by staff members and were then denied medical and dental treatment for their injuries by facility staff. One child reported that he had a big bump on his head and injuries to his arm that restricted his movement for several days. Another child had a chipped tooth and severe bruising in the chest area such that he could not move following the punishment and could not participate in daily activities on the following day.</p>	<p>Provide medical and dental care to all youth who request care and all youth whose condition indicates to staff that they need care.</p>	Immediately	#8 See Attached Response Page 22	

12/16/2013 MON 15:33 FAX

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32(n) Specific Incidents.	On or about February 2, 2000 the facility subjected a child, D, to punishment and discipline that the child stated caused him to inflict serious injuries to himself in order to get to a hospital where he could report alleged abuse by Glen Mills staff persons. On or about February 10, 2000, a child, C, stated to departmental staff that he would kill himself if he was returned to the facility.	Cease all physical contact and verbal harassment of youth.	Immediately (see also corrective action for 3800.32(b))	#9 See Attached Response Page 23	
33(a) Deprivation of rights.	The facility deprived children of the following specific rights: the right to be free from abuse, mistreatment, threats, and harassment, to send mail without having it opened or read by facility staff, to receive appropriate medical and dental care and to be free from extreme methods of discipline, as specified in the violations in this report of 3800.32 (b)(e)(g)(k) and (n)(related to specific rights).	Provide all youth and their parents with written notice of the rights of youth at the facility. In conjunction with Departmental staff, meet with all youth to review the statement of rights and what it means. Submit written notice to be provided to youth and their parents to the Department for approval.	10 work days following receipt of LIS. Documentation of mailing to parents and documentation of receipt of notice signed by youth and placed in youth records: 15 work days following receipt of LIS.	#10 See Attached Response Page 24	
33(b) or	Mr. [REDACTED] Chief Executive Officer and Mr. [REDACTED] Managing Director, did not assure the safety and protection of children (those named as victims of alleged child abuse by Glen Mills staff members) following 13 reports of alleged child abuse. [REDACTED] permitted staff members X, Y and Z to continue to work directly with children after being named in allegations of child abuse in which children sustained injuries that caused severe pain or temporary impairment. Staff	Cease all actions that impede access to youth or obstruct or delay the ability of the Department and its authorized agents to privately interview youth to review facility records or to move freely about the facility grounds.	Immediately	#11 See Attached Response Page 25	

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55(a) Care r  12	<p>member X was permitted to continue to work directly with children after he was named as a perpetrator in an August, 1999 indicated case of abuse and again in a February, 2000 report of alleged abuse. As observed by a staff person from the State of Delaware on February 11, 2000, an assistant district attorney and a state police officer on or about February 15, 2000 and by departmental staff on March 8, 2000, [REDACTED] continued to permit staff member X to work directly with children.</p> <p>The facility does not meet the required child care worker to child ratios of one child care worker for every eight children in three facilities. Four staff members from Van Buren facility, reported that they are responsible for between 10 and 13 students each. The facility houses 66 students and has four child care workers and two supervisors assigned to it.</p> <p>One child, B, reported that in Johnson facility there are 48 children in residence with four child care staff Monday through Friday and 2-3 child care staff on weekends.</p> <p>One child, G, reported that in Taylor facility there are 68 children in residence and four child care staff.</p>	Add sufficient child care staff to meet the staff to child ratios.	60 calendar days following receipt of LIS.	#12 See Attached Response Page 26	

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147(a) if xcd.	The facility permits the use and possession of tobacco by children and staff persons. On February 11, 2000 a child, C, was permitted to smoke cigarettes sent to him by family members. On March 23, 2000, facility staff W stated that students can bring cigarettes or have them mailed by parents. Any student can smoke if they want to. One parent also reported that she brought cigarettes to the facility for her son. One child, B, reported that students can smoke outside of buildings or wherever there are ashtrays.	Cease all smoking by youth.	Immediately	#13 See Attached Response Page 27	
12(a) if restrictive measures.	The facility's level system, particularly "touch for attention", was used in a punitive manner for ten children. The level system is applied to administer corporal punishment for behavior management purposes.	Abolish the seven level behavior management system.	See corrective action for 3800.32(b) and 3800.33(a).	#14 See Attached Response Page 28	
1, 3, 1 mental competency Responses for Abuse Investigations.	The facility has conducted its own investigations of child abuse allegations and reached its own conclusions regarding whether the reports are substantiated in violation of 23 Pa.C.S. 63 and 55 Pa. Code Chapter 3490.51, 53 and 81. The Department is the sole civil agency responsible for investigation of allegations of abuse when the allegations relate to persons who are considered agents of a county children and youth agency. In plans of supervision submitted by Managing Director [REDACTED] and in correspondence from facility counsel [REDACTED] Esq., regarding nine staff persons, the facility conducted investigations of the allegations and	Cease conducting investigations and interviews with youth who are named as victims in allegations of child abuse until the child abuse investigation has been completed. Notify all facility staff in writing that youth involved in child abuse situations are not to be interviewed by anyone at the facility regarding the incident under investigation until the child abuse investigation has been completed. Provide evidence that written notice has been provided to all staff to the Department.	To cease investigations and interviews: Immediately  To issue written notice: 2 work days following receipt of LIS.	#15 See Attached Response Page 29	

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14	made a determination regarding that the reports were not substantiated, the facility determined that no plan of supervision was needed.				